

ATTACHMENT A

OBJECTIVES AND GENERAL REQUIREMENTS OF THE SITE INVESTIGATION ADMINISTRATIVE ORDER ON CONSENT U.S. EPA DOCKET NO.

Objective of the Site Investigation Work Plan

The objective of the Site Investigation is to characterize the environmental conditions of the Site and to determine the full nature and extent of contamination in all media to ultimately aid in the selection and design of a final remedy. In meeting this objective, a Site Conceptual Model is necessary.

The Site Investigation Work Plan shall meet the following requirements, in addition to the specific requirements and deadlines set forth in the Order:

I. The RCRA Facility Investigation ("RFI") Guidance in Volume I Section 2 of EPA Document Number EPA 530/SW-89-031, "RCRA Facility Investigation (RFI) Guidance," (May, 1989) shall be followed when developing the Site Investigation Work Plan. See Chapter III of OSWER Directive 9902.3-2A, "RCRA Corrective Action Plan" (May, 1994) (Attachment F) for additional guidance.

II. The Site Investigation Work Plan shall include a Project Management Plan which will include schedules and a description of the technical approach.

III. The Site Investigation Work Plan shall include a Site Conceptual Model in accordance with the guidance in Attachment G.

IV. The Site Investigation Work Plan shall include a Data Collection Quality Assurance Plan and a Data Management Plan, developed as per the requirements set forth in Attachment C of the Order.

V. The Site Investigation Work Plan shall include a Sampling and Analysis Plan. This plan shall address the sampling techniques, analytical parameters, and analytical methods to be used for characterization of all media. Rationale shall be provided to support the selection of each technique, parameter and method.

VI. The Site Investigation Work Plan shall include a Public Involvement Plan, to be developed in consultation with EPA, for the dissemination of information to the public regarding the investigation activities and results. The Public Involvement Plan shall specify the repository for all submittals and reports required by this Order. The Public Involvement Plan shall also specify the methodology for identifying interested members of the public that will be notified of the placement of any information in the repository. Interested members of the public shall include, but not be limited to, the owners and operators of adjacent properties.

VII. The Site Investigation Work Plan shall include provisions for carrying out investigations necessary to characterize geology, stratigraphy and hydrogeology beneath the Site, define the sources, nature and extent of contamination in all media, and identify actual or potential receptors. The investigations must result in data of adequate technical quality and assure that the full nature and extent of each Hazardous Waste released at or from the Facility has been determined in each media to EPA's satisfaction and as necessary to identify, develop and implement appropriate corrective measures that protect human health and the environment. Detailed work plans and technical specifications for specific investigative activities, such as treatability studies, within the Site investigation may be submitted and implemented in a phased manner, and may utilize information obtained during prior phases of the investigation. The Site Investigation Work Plan shall include provisions for characterizing the Site as set forth in Attachment B.

